

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Review of the Commission's Broadcast and) MM Docket No. 98-
204
Cable Equal Employment Opportunity Rules)
and Policies)

TO THE COMMISSION

MOTION FOR EXTENSION OF REPLY COMMENT DEADLINE

The Minority Media and Telecommunications Council ("MMTC"), on its own behalf and as counsel for forty-four other organizations in this proceeding (collectively the "EEO Supporters"), and pursuant to 47 C.F.R. §1.46, respectfully requests an extension of time of two weeks (until May 29, 2002) to file reply comments.

MMTC represents most of the civil rights organizations, minority professional organizations, and minority broadcasters in this proceeding. Given MMTC's limited resources, it is impossible within the time allowed to analyze the 493 pages of industry filings and draft a response by the May 15 deadline.^{1/} The industry comments contain numerous theories and proposals not previously advanced in four years of litigation in this docket. A thoughtful response to each of these theories and proposals will require thorough legal and factual research.^{2/}

^{1/} MMTC was able to meet the deadline for comments in this proceeding because it enjoyed the services of two experienced law clerks. However, both clerks are graduating, and are starting final examinations next week. One has completed her clerkship with MMTC and the other will complete her clerkship on May 24.

2/ MMTC is also filing extensive reply comments in the local radio ownership proceeding (MM Docket No. 01-317). Those comments are due May 8. MMTC filed over 170 pages of initial comments in that proceeding.

A two week extension of time would not result in substantial delay in the proceeding, but it would ensure that the Commission has at its disposal a full record in this important matter.

Respectfully submitted,
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